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*Attorneys for Applicant Palantir Technologies, Inc.*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

) Misc. Case No.

EX PARTE APPLICATION OF PALANTIR  
TECHNOLOGIES, INC. FOR ORDER  
PURSUANT TO 28 U.S.C. § 1782 TO OBTAIN  
DISCOVERY FOR USE IN FOREIGN  
PROCEEDINGS

**DECLARATION OF WERONIKA  
BUKOWSKI**

I, Weronika Bukowski, an attorney admitted to practice in the State of New York, declare  
under penalty of perjury under the laws of the United States as follows:

1           1.       I am an attorney with Freshfields Bruckhaus Deringer US LLP, counsel to Palantir  
2 Technologies, Inc. (“Palantir”). I am familiar with the facts set forth in this declaration from personal  
3 knowledge and documents I have reviewed.

4           2.       I submit this declaration in support of Palantir’s Ex Parte Application for an Order  
5 Pursuant to 28 U.S.C. § 1782 to Obtain Discovery for Use in Foreign Proceedings. This Application  
6 relates to pending and anticipated foreign proceedings in Germany.

7           3.       Specifically, on August 6, 2018, Palantir commenced an action against Marc L.  
8 Abramowitz (“Abramowitz”), captioned Palantir Technologies, Inc. v. Marc L. Abramowitz, Case No.  
9 21 O 11054/18, in the Regional Court of Munich I, Patent Law Chambers (the “German Court”). In  
10 this action, Palantir seeks a declaration that Abramowitz was not entitled to obtain certain patents  
11 concerning cyber security and cyber insurance technologies that properly belonged to Palantir. In  
12 addition, in the German Proceeding, Palantir also seeks compensation for all damages suffered as a  
13 result of Abramowitz’s filing and discontinuation of the filing.


14           4.       In addition, Palantir anticipates bringing in the near future a second action against  
15 Abramowitz in the German Court, in which it will seek a declaration that Abramowitz was not entitled  
16 to obtain certain patents concerning healthcare related technologies invented by Palantir. The  
17 technologies described in these patents relate to the interpretation and analysis of various forms of  
18 data for patient recruitment in clinical trials held by pharmaceutical companies and academic  
19 institutions and data analytic services to perform insurance risk assessments, including, for example,  
20 patient diagnoses not accounted for by health insurance companies and healthcare fraud risks.

21           5.       Attached hereto as Exhibit A is the form of a proposed subpoena seeking documents  
22 from Abramowitz.

23           6.       Attached hereto as Exhibit B is the form of a proposed subpoena seeking testimony  
24 from Abramowitz.

25 I declare under penalty of perjury under the laws of the United States of America that the foregoing is  
26 true and correct.

1 Executed this 10<sup>th</sup> day of August 2018 in New York, New York.

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